2500-FM-LRWM0276 Rev. 5/99



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION **BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

pection Date: <u>12/09/2003</u>						
Time Start:						
Time Finish:	<u> </u>					

#### **HAZARDOUS WASTE INSPECTION REPORT** ☐ GENERATOR $\boxtimes$ S Q GENERATOR

Company name: Giles and Ransome, Inc.	I.D. Number: <u>PAD007910417</u>
Site Address 2975 Galloway Road, Bensalem, PA	
County: <u>Bucks</u> Municipality: <u>Bensalem</u>	Township Zip: 19020
Name of Inspector <u>Dirk Robinson and James Pagano</u>	
Name & Title of Responsible Official: Mike Barnasevitch – Risk Ma	anagement Coordinator
Person Interviewed: Karen Scollon and Dan Weaver	Telephone: <u>215-639-4300</u>
Mailing Address (if different from above): Same	
Amount of Hazardous Waste Generated per Month: 1,200	Pounds Kilograms
1. Site Characterization:	
STORAGE:  Container  Tanks  Containment B	lldg. ☐ Drip Pad Other
PBR:	Other
GENERATOR TREATMENT	s ☐ Containment Bldg. ☐ Drip Pad
2. Universal Waste: 🛛 Large Quantity Handler	☐ Small Quantity Handler
Universal Waste Types: <u>Batteries</u>	
3. Hazardous Waste Transporters:	
Transporter Name: Republic Environmental Systems	License Number: PA-AH 0317
1. Types of hazardous waste generated and destination facil	lity (location & type).
	The state of the

Waste Code	Waste Description	Destination Facility
D001	Waste Flammable Liquids	Republic Environmental Services
		2869 Sandstone Drive
D007	Hazardous Waste Solid (lead & chromium)	Hatfield, PA 19940
* 2		
D001, D039	Petroleum Naphtha	Safety-Kleen - Fairless Hills, Pa

### **HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name: Giles and Ransome, Inc. ID Number: PAD007910417

Date: 12/09/2003

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	.4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
Χ				Authorized transporters only	262a.10	262.12(c)	H003
X		L	L	Subsequent notification requirements met	262a.12(b)		H004
X			Ŀ	Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X	,			Satellite accumulation requirements complied with	262a.10	262.34(c)	_H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
	Χ			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X			٠.:	Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X	_			Special requirements followed for international shipments	262a.10	262.50 & 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
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# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name: Giles and Ransome, Inc. ID Number: PAD007910417 Date: 12/09/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

3	ıA	ı U	•		PA CIT.	FED CIT.	LINE
1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
				CONTAINERS (Subchapter I)			
Х				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
Х				Containers of hazardous waste in good condition	265a.1	265.171	H026
X		L		Containers and stored waste compatible	265a.1	265.172	H027
Х				Containers kept closed except during addition or removal 265a.1 265.173(a) of wastes		H028	
Х				Containers managed to prevent leaks	265a.1	265.173(b)	H029
Х				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
Х				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X	Ш			Proper containment and collection systems in place	265a.179		H033
X	Ш			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
Х				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name: Giles and Ransome, Inc.

ID Number: <u>PAD007910417</u>

Date: 12/09/2003

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 :	2 :	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	$\perp$	_		LQG TANKS (Subchapter J)		9	
	X.	$\perp$		Tanks labeled "Hazardous Waste"	262a.10	262,34(a)(3)	H040
7	×			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
	×			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
,	X			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
	<u> </u>			Tanks labeled to accurately identify contents	265a.194		H044
,				Required inspections completed and documented in operating log	265a.195	265.195	H045
,	4		Release reported to Department within 24 hours, unless 265a.1 265.196 exempted				
,	4			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
+	<u> </u>	+	-	Special small quantity generator requirements	265a.1	265.201	H048
		1		SQG TANKS			
	<u> </u>			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
)	1			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
_ >	仜	1	Ĺ	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	-	$\downarrow$		Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	+-	1		Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
		$\downarrow$		All waste removed at closure	265a.1	265.201(d)	H056
)	4			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
_ >	_	1		Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<u> </u>	4	+	1	Incompatible waste requirements met	265a.1	265.201(f)	H059
$\perp$		$\dagger$	_			<u> </u>	<del> </del>

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name: Giles and Ransome, Inc.

ID:Number: PAD007910417

Date: 12/09/2003

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4 REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	_	Ш	Containment Buildings (Subchapter T)			
	x		Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	<u>x</u>	Ш	Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	X		Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
	X		Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
	x		Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	Х		No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
	X		Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	X		Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
_						
_		_	Drip Pads (Subchapter S)			
	X		Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
	Χ		Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
	Х		(a) Nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
	х		(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
	x		Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
	x	,	Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
	х		Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
	X		Release reporting requirements met	265a.1	265.443(m)	H076
	x		Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

ER-WM,-129: Rev. 10/95

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Date of inspection:	12/09/2003	•	Identification Number:	PAD007910417
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Company/Facility/Site Name: Giles and Ransome, Inc.

A hazardous waste inspection was conducted on the above referenced facility by Waste Management inspector Dirk Robinson and Waste Management Supervisor James Pagano. Representing Giles and Ransome during the inspection was Karen Scollon, Risk Management Secretary; and Dan Weaver, Sales Representive.

Giles and Ransome is a sales and repair facility for "caterpillar" heavy construction equipment. The facility also stripes and paints parts of the caterpillar construction equipment.

Three hazardous waste streams are generated at the facility. Paint chips, which are generated from a sandblasting operation, a sludge that is generated from a cook off operation, and a corrosive waste from batteries.

Waste batteries are sent off site for recycling and the corrosive liquid waste from draining the batteries is also sent off site for recycling. Paint chips from the sandblasting operation are separated from the sand and the sand is recycled back into the sandblasting operation.

The sludge is generated from a cook off operation. The waste stream prior to cook off is generated from a cleaning operation and consists of 5% sodium nitrate which is an oxidizer (D001) and 5% potassium hydroxide which is a corrosive (D002) which then diluted with water making it a non hazardous waste stream. By the time it is cooked down the resulting sludge is hazardous for chromium and lead, which is introduced during the cleaning of equipment parts. Giles and Ransome submitted to the department a waste analysis profile for parts cleaner waste stream prior to cooking off that indicated it as being non hazardous.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

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Person interviewed (s	ignature):	20 40 1 a.	estelle.	Date:	12/17/05
	11/1/1		at a superior superio		
Inspector (signature)_	-took 1.	FARME	· · · · · · · · · · · · · · · · · · ·	Date:	12/17/03
	•	1			
		Page of	7		

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

ER-WM.-129: Rev. 10/95

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

			1		2	
Date of inspection: 12/09/200	<u>)3</u>	•		:	<b>Identification Number:</b>	PAD007910417

Company/Facility/Site Name: Giles and Ransome, Inc.

The hazardous waste storage area contained drums of hazardous waste sludge, solid paint chips, corrosive acid, and non hazardous waste oil. At the time of the inspection labels were being reapplied since the cold weather had made them fall off. The hazardous waste labels did not have the required dates written on them. There was one portable secondary containment pallet that held one drum.

A record review of manifests for the year 2003 was conducted and they appeared to be properly completed and routed within the specified time limits. The PPC plan had all the required elements and appeared to be up to date. Training records were available for those employees who manage hazardous waste. A weekly inspection log for the hazardous waste storage area was up to date.

Recommendation: The purchase of more portable secondary containment pallets should be made so that all liquid hazardous waste can be properly stored.

One violation noted during this inspection is as follows:

1. Containers were not clearly marked with accumulation date and visible for inspection, in violation of Title 40 § 262.34(a)(2).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (s	signature):	Marles	to face	liter	Date:	12/17/03
Inspector (signature)	Pirk	K. Ba	ason		Date:	12/12/03
,		5	<del></del>	• • • • • • • • • • • • • • • • • • •		



Inspection Date	4/4/2003
Time Start	2:00 Pm
Time Finish	3:00 PM

# HAZARDOUS WASTE INSPECTION REPORT GENERATOR S Q GENERATOR

Co	mpany name <u>Gite</u>	5 \$ RAD	150ME, I	NC.	D. Number <b>PAO</b> ©	07910417
Sit	e Address <b>2975</b>	GALLOWAY	ROAD	·		
Со	unty BUCKS	Mu	nicipality Bew	SALEM TU	IP. Zip 19	020
Na	me of Inspector	LEX PAGE	· · · · · · · · · · · · · · · · · · ·			
Na	me & Title of Responsib	le Official <u>MIK</u>	E BARNAS	EVITCH	- RISK MGT	COURDINATO
Pe	rson Interviewed Mt	RE BARNA:	BEVITCH	T	elephone ( <b>2:5</b> ) <u></u>	39-4306
Ma	iling Address (if differen	t from above)	SAME	· · · · · · · · · · · · · · · · · · ·		
Αm	ount of Hazardous Was	ite Generated per l	Nonth: 108	<b>26</b> Po	unds	Kgs
1.	Site Characterization	•	, ú			
	STORAGE: X Con	tainer 🔲 Tanks	☐ Containme	nt Bldg. 🔲 Drij	Pad Other	
	PBR:	tralization/WWTP	☐ Reclaim		Other	
	GENERATOR TREAT	MENT 🗌 Contai	ners 🔲 Ta	anks 🔲	Containment Bldg.	☐ Drip Pad
2.	Universal Waste:	Large Quantity Ha	indler	mall Quantity H	landler	
	Universal Waste T	ypes GENERA	ITOR OF	NICKEL.	- CADHIUM B	ATTELIES
3.	Hazardous Waste Tra	nsporters:	* s;	a •		
	Transporter Name	ST. Joseph	MOTOR LI	NES L	cense Number PA	-AH 0390
					cense Number PA	
	Transporter Name	ENVIR. WASI	R MONIMIZ	LATION L	cense Number <u><b>PA</b> -</u>	AH OGBZ
4.	Types of hazardous v	vaste generated a	nd destination	facility (locati	on & type).	
	Wests Onds	385-	-4- Di			
	Waste Code		ste Description		Destination	
	Daos / Foo5	WASTE PAIL	T RELATED	MATERIAL	PERMA-FIX O	F S. Georgia
	-		· · · · · · · · · · · · · · · · · · ·	;	VALPOSTA GA	. 31601
	D007/0008	HAZ. WASTE	SOLID L	END/CHROME	PERMA-PIX O	F MICHGAN
		,		• .	WYANDOTTE.	· .
	Poul /Fou 7	WASTE FLA	MARIK 116		EQ RESource	
	1001/1007		PIFINOVA LI S	<u>`a</u>	_	İ
				·	36345 VAN 0	
		- 4		•	ROMULUS MI	48174
	2002, 2006	WASTE CAD	MIUM BAT	TERLES	AERC - ALLOT	WN 18103

### **DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

### **HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name GILES + RANSOME ID Number PAO 007910417 Date 4/4/2003

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

_1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
×				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X	•		L	Identification Number	262a.10	262.12	H002
X	ŀ			Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
×				Proper manifest used	262a.10	262.21	H005
×	_			Manifests filled out correctly and completely	262a.20		H006
×				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
×				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
×	,			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X		_		Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
×		_		Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
×				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	×			Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
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# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name GILES + RANSOME ID Number PAD 007910417 Date 4/4/2003

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
×			L.	Containers of hazardous waste in good condition	265a.1	265.171	H026
X			Ĺ	Containers and stored waste compatible	265a.1	265.172	H027
x				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X			-1	Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
×			ž.	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037
$\perp$	_L				(2)		

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name GILES + RANSOME ID Number PAP 007910417Date 4/4/03

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 2 ;	3 4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X	$\perp$	LQG TANKS (Subchapter J)	-		
	ļ	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
V		Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
		Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
		Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
		Tanks labeled to accurately identify contents	265a.194		H044
		Required inspections completed and documented in operating log	265a.195	265.195	H045
		Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
		Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
+	-	Special small quantity generator requirements	265a.1	265.201	H048
x		SQG TANKS			
		Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
Y		Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	1	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
_ _ _	_	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
$\bot \bot$		Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
		All waste removed at closure	265a.1	265.201(d)	H056
		Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
		Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
		Incompatible waste requirements met	265a.1	265.201(f)	H059
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# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	GILES +	RANSOME	ID Number <u>Pa0007910417</u>	Date	4/4/03
~			<del></del>	<b>—</b>	
	4 31 30 1 11				

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

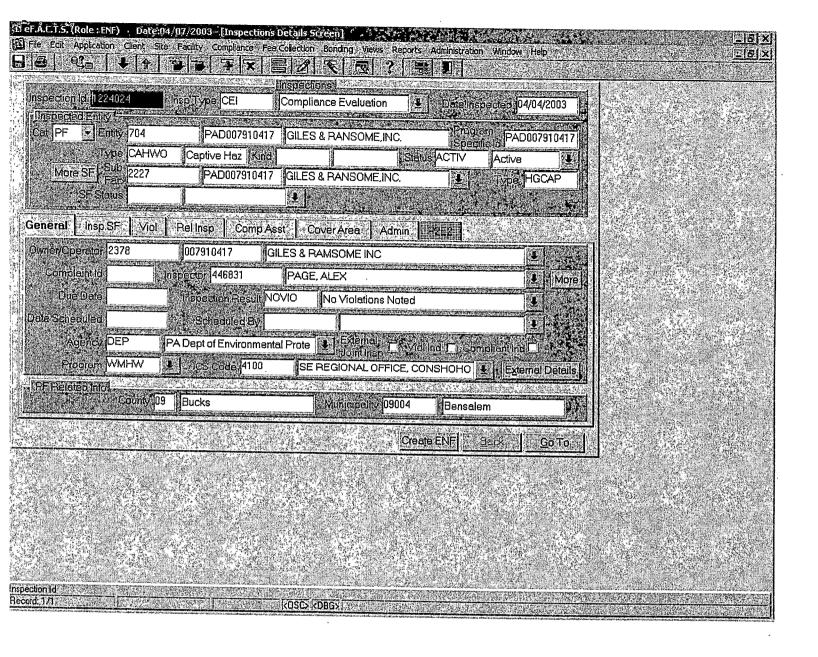
1	2	3	4 REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X		Containment Buildings (Subchapter T)			
			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	,		Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
		-	No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	1		Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
9	K	1	Drip Pads (Subchapter S)			
			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
N			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
	1		(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
	_		Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
	1		Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
			Release reporting requirements met	265a.1	265.443(m)	H076
			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

### **INSPECTION REPORT COMMENTS**

Date of Inspection 4/4/2003	Identification Number PAD 0079 10 417
Company/Facility/Site Name GILES # R	
INSPECTION CONFICTED	BY ALEX PAGE. MIKE
BARNASEVITCH, RISK MGT.	COORDINATOR WAS THE FACILITY
GUIPE. GILES + RANSOME	15 A SALES AND REPAIR
FACILITY FOR CATERPILLAR	
EQUIPMENT. GILES AND	
300 PEDPLE WHO WORK 2	•
1	SECURITY GUARP, CHAIN LINK
FENCE AND ALAMM SYSTEM	
HAZARDOUS WASTE STREAM	
DEGREASING SLUDGE, SPENT	
	BATTERIES. AT THE HAZARPUL
WASTE STORAGE AREA, DRUM	
LABELED AND HAD ACCUMULATE	
180 PAYS.	
AT A RECORP REVIEW, MA	NIFESTS WERE AVAILABLE
AND APPEARED PROPERLY COM	•
TIME LIMITS. THE P.P.C. P.	•
This inspection report is notice of the findings of an inspection report is formal notification of any violations observed during the concerning either violations noted herein, or other violations Department records.	ction conducted by a representative of the Department. This inspection. Additional notification of violations may be issued identified as a result of review of laboratory analyses or
This report does not constitute an order or other appealate	ble action of the Department. Nothing contained herein shall
be deemed to grant or imply immunity from legal action for any vi Signature by the person interviewed does not necessarily acknowledge that the person was shown the report or that a cop	imply concurrence with the findings on this report, but does
Person interviewed (signature) Mufay & Base	ment Date 4-4-03
Inspector (signature)	

### **INSPECTION REPORT COMMENTS**

Date of Inspection 4/4/2003 Identification Number PAD 0079 10 417
Company/Facility/Site Name GILES + CANSOME
AND APPEARED TO BE UP TO PATE AND CONTAINING
ALL REQUIRED ELEMENTS.
TRAINING RECORDS WERE AVAILABLE AND BUTH
TRAINING TOPICS AND PERSONNEL SIGN IN SHEETS WER
INCLUDED.
A WEEKLY INSPECTION LOG OF THE HAZAR-DOUS
WASTE STORAGE AREA INPICATED THAT NO LEAKS OR
SPILLS OCCURED DURING THE PAST YEAR.
NO VIOLATIONS OBSERVED
• ,
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.  Person interviewed (signature)  Date 4-4-0-3  Inspector (signature)
Page <b>7</b> of <b>7</b>





Inspection Date	2/22/2002
Time Start	10:00 AM
Time Finish	12:00 2001

<b>HAZARDOUS WASTE</b>	INSPECTION REPORT
GENERATOR	✓ S Q GENERATOR

Coi	mpany name GILES	5 + RANSOME	, INC.	I.D	. Number <i>PA 0 00</i>	7910417
Site	Address 2975	GALLOWAY RO	PAD			
Cou	unty BJCKS	Municipa	lity <u>BENSALEM</u>	Town	SHIP Zip 190	020
Nar	me of inspectorA	EX PAGE				
Nar	me & Title of Responsib	ole Official MIKE BA	RNASEVITO	CH -	RISK MANAG	GEMENT CW.
		KE BARNASEV				
Mai	iling Address (if differen	t from above)SA+	1 <i>E</i>		· · · · · · · · · · · · · · · · · · ·	
Am	ount of Hazardous Was	ste Generated per Month:	1200	Pour	nds	Kgs
1.	Site Characterization	:				
	STORAGE: 💢 Cont	tainer 🔲 Tanks 🔲 🤆	Containment Bldg.	☐ Drip	Pad Other	
	PBR: Neut	tralization/WWTP 🔲 F	Reclaim		Other	
	GENERATOR TREATI	MENT	☐ Tanks	□с	ontainment Bldg.	☐ Drip Pad
2.		Large Quantity Handler				,
	Universal Waste T	ypes GENERATOR	- NICKE	2-4	IDMINA BATTE	MES
3.	Hazardous Waste Tra					
	Transporter Name	REPUBLIC ENVIL	2 Sys.	Lic	ense Number <u>PA</u>	-AH0317
		:				
	Transporter Name		·	Lic	ense Number	
4.	Types of hazardous v	vaste generated and de	stination facility	(locatio	n & type).	·
	Waste Code	Waste De	escription		Destination F	acility
	Door	WASTE FLAME	1ABLE LIO	U1D5	REPUBLIC E	WIR. SYS
	0007	1.tazardous L			2869 SAND	
		;			HATFIELD PI	
					INTITIELY 17	, , , , , ,
					•	

### **HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name GILES + RANSOME ID Number PAD 007910417 Date 2/22/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

FED. CIT.

PA CIT.

LINE

1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
×				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				· Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
×				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
×				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
×				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
×				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
×				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
×				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017_
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
×				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	×			Source reduction strategy prepared and available (LQG only)	262a.100		H020
×		_		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name GILES + PANSOME ID Number PAD 007910417 Date 2

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

STATUS		S		PA CIT.	FED CIT.	LINE	
1	2 3 4 REQUIR		4	REQUIREMENT	25 PA Code	40 CFR	NO.
Ť				CONTAINERS (Subchapter I)			
×				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
×	П			Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
×				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
×				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
V				Container storage areas inspected at least weekly	265a.1	265.174	H031
X		-		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X	寸	7		Proper containment and collection systems in place	265a.179		H033
V	$\dashv$	+	寸	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
×	1			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X	+	+	+	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
×				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name GILES + RANSOME ID Number PADO07910417 Date 2/22/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

STAT 1 2		REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X		LQG TANKS (Subchapter J)			
1		Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
		Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
		Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
		Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
		Tanks labeled to accurately identify contents	265a.194		H044
		Required inspections completed and documented in operating log	265a.195	265.195	H045
		Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
		Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
V		Special small quantity generator requirements	265a.1	265.201	H048
×	-	SQG TANKS			
		Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
		Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	1	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
		Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
		Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
		All waste removed at closure	265a.1	265.201(d)	H056
		Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
		Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
V		Incompatible waste requirements met	265a.1	265.201(f)	H059
++	_				

### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name GILES + RANSCHE ID Number PADDO7910417 Date Z/ZZ/ZOOZ

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

PA CIT.

FED CIT.

LINE

1 2 3	3	4	REQUIREMENT	25 PA CODE	40 CFR	NO.
X			Containment Buildings (Subchapter T)			
			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
V			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
×			Drip Pads (Subchapter S)			
			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
			Release reporting requirements met	265a.1	265.443(m)	H076
V			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

### **INSPECTION REPORT COMMENTS**

Date of Inspection $\frac{z/zz/zoo2}{}$ Identification Number $\frac{PAD}{}$ OC7910417
Company/Facility/Site Name GILES AND RANSOME
INSPECTION CONDUCTED BY ALEX PAGE, MIKE BARNASEVITCE
RISK MANAGEMENT COORDINATUR, WAS THE FACILITY
GUIDE, GILES + RANSOME IS A SALES AND REPAIR
FACILITY FOR "CATERPILLAR" HEAVY CONSTRUCTION
EQUIPMENT. GILES AND RANSOME EMPLOY ABOUT
300 PEOPLE WHO WORK 2 SHIFTS, ACCESS CONTROL
IS PROVIDED BY ZYHR. SECURITY GUARD PRESENCE
AND ALARM SYSTEMS.
TWO HAZARDOUS WASTE STREAMS ARE GENERATED,
D WASTE PAINT SOLVENTS AND (Z) WASTE PAINT
CHIPS (SOLID). AT THE HAZARDOUS WASTE STORAGE
AREA, DRUMS OF HAZARDOUS WASTE WERE LABELED
AND HAD ACCUMULATION START DATES LESS THAN
180 DAYS. PORTABLE CONTAINMENT PALLETS ARE
USED FOR SECONDARY CONTAINMENT.
AT A RECORD REVIEW, MANIFESTS WERE
AVAILABLE AND APPEARED PROPERLY COMPLETED AND
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature)
Inspector (signature)
フィリカ Page <u>く</u> of <u>8</u>

2510-FM-LRWM0129 Rev. 1/97

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Date of Inspection 2/22/2002 Identification Number Pal 0079 10417
Company/Facility/Site Name GILES + PLANSOME
ROUTED WITHIN TIME LIMITS. A COPY OF A
TYPICAL MANIFEST IS INCLUDED WITH THIS REPORT.
THE P.P.C. PLAN WAS AVAILABLE AND
ENERGENCY COOPDINATOR NUMBERS WERE CHECKED
AND FOUND TO BE ACCUPATE. A P.P.C PLAN
REVISION IS PLANNED FOR THIS YEAR.
TRAINING RECORDS WERE AVAILABLE (ON CUMPUTER)
AND TOPIC DESCRIPTIONS AND PERSONNEL IDENTIFICATION
WERE INCLUDED.
NICKEL CADMIUM BATTERIES (UNIVERSAL WASTE) ARE
PRESENT AT G.+ R. RECEIPTS FOR RECYCLING- WERE AVAILABLE.
NO VIOLATIONS GBSERVED
to the second of

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

-				<u> </u>		2 22 62
Person interviewed (signatu	me An	upo la	Ban	render	Date _	02-22-02
· · · · · · · · · · · · · · · · · · ·	1.	Thur	سيراج	,	_	
Inspector (signature)	- New	Page.	<u></u>	<u> </u>		
			. •			- 2

Page <u>7</u> of <u>8</u>

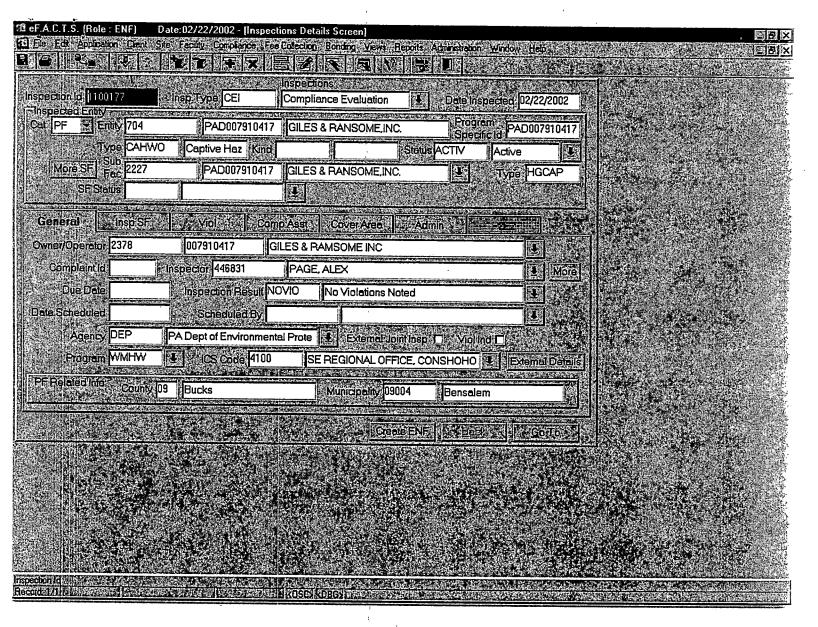
III case or an emergency or spin minitedratery can trie mattern and mesponse center (800) 424-8802 and the PA DEP (717) 787-4343

FEB 2 7 2001

# PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Bureau of Land Recycling and Waste Management P.O. Box 8550 Harrisburg, PA 17105-8550

Form approved. OMB No. 2050-0039

2500-ENGLHWM0051 REV. 7/99  OFFICIAL PE	NNSYLVANIA MANIFES	TFORM	· · · · · · · · · · · · · · · · · · ·			
UNIFORM HAZARDOUS  UNIFORM HAZARDOUS  1. Generator's US EPA ID N  WASTE MANIFEST   P A D 0 0 7 9 1 0 4	17 300	2. Page 1 of		in the bold red border is Federal law but may be e law.		
8: Generator's Name and Mailing Address G.I.L.E.S & RANSOME 2975 GALLAWAY ROAD ATTN SANDY CARBONNEAL		A. State M	PAG 327491			
BENSALEM PA 19020		B. State G				
5. Transporter 1 Company Name	6. US EPA ID Number	C. State To		2 1 7		
REPUBLIC ENV SYS (TRANS GROUP) PADS 7. Transporter 2 Company Name	8. US EPA ID Number		/ LI L	3 1 7 15 822-2676		
9. Designated Facility Name and Site Address	10. US EPA ID Number	E. State Tr	rans, ID -AH			
REPUBLIC ENV SYS (PA), INC. 2869 SANDSTONE DRIVE		F. Transpo	orter's Phone(	) -		
<b>)</b> [	8569059		's Phone ( 215	822-8995		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number	· ·	12. Containers  No. Type,	13. Total Quantity	14. I. Unit Waste No. Wt/Vo!		
RQ WASTE PAINT RELATED MATERIAL, 3, U	i .	Х3 рм	X 2100	G D O O 1		
WASTE BATTERIES, WET, FILLED WITH A E PG II, (D002)*			,, -, -, -, -, -, -, -, -, -, -, -, -, -	P D O O 2		
R . RQ HAZARDOUS WASTE, SOLID, N.O.S.,	, NA3077,	- C W		7 0002		
PG III, (LEAD, CHROMIUM ), (D007)*	, X	X8 DM	X 5600	P D O O 7		
R d.				·		
J. Additional Descriptions for Materials Listed Above	,	K. Handling	Codes for Wastes List	ed Above		
L ED37637 S	WD37399	. S01	<b>c.</b>	501		
S AS43009		, S01	, C.			
15. Special Handling Instructions and Additional Information			Y PHONE 215	629.42m		
41A- F003		EMERCIENC	r FRONC X13	- 51. 1500		
11B- D006 11C- D008						
		•				
16. GENERATOR'S CERTIFICATION:  I hereby declare that the contents classified, packed, marked and labeled and are in all respects in proper condition If I am a large quantity generator, I certify that I have a program in place to repracticable and that I have selected the practicable method of treatment, storage,	for transport by highway accord educe the volume and toxicity of or disposal currently available to	ding to applicable internated to the maste generated to the meaning are strong to the manimizes the meaning are strong to the meaning to the m	ational and national go ne degree I have deter ne present and future-	mined to be economica meat to human health a		
the environment; OR, if I am a small quantity generator, I have made a good faith to me and that I can afford.  Printed(Typed Name)	effort to minimize my waste ger	neration and select the t	Jest Wasiearianagerie	MONTH DAY YEAR		
17. Transporter 1 Acknowledgement of Receipt of Materials	( Truck	Ul Jung	10	12   19   01		
Printed/Typed Name  LONG	Signature		·	ONTH DAY YEAR		
18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name	Signature		^	IONTH DAY YEAF		
19. Discrepancy Indication Space		/ jal				
	1///	- 10		·····		
20/ Facility Owner or Operator: Certification of receipt of hazardous materials covered b	y this manifest except as noted i	n item 19.1/ [		MONTH DAY YEAR		





Inspection Date	2/14/	2001
Time Start	1315	PM
Time Finish	3:00	PM

# HAZARDOUS WASTE INSPECTION REPORT GENERATOR S Q GENERATOR

Co	mpany name GILES	5 + RANSOME, INC.	I.D. Number PAO 007910417
Sit	e Address 2975	GALLOWAY ROAD B	ENSALEM
Co	unty BUCKS	Municipality BENSALET T	OWNSHIP Zip 19020
Na	me of Inspector A	LEX PAGE	
Na	me & Title of Responsit	ole Official MIKE BARNASEVITCH	1 - RISK MGT. COORDINATO
Pe	rson interviewed <u>Mi</u>	KE BARUA SEVITCH	Telephone ( 215) 639 - 4300
Ma	iling Address (if differer	nt from above)SAHE	
An	nount of Hazardous Was	ste Generated per Month: 1200	Pounds Kgs
1.	Site Characterization		
	STORAGE: X Con	tainer 🔲 Tanks 🔲 Containment Bldg. 🔲 🛭	Orip Pad Other
			Other
	GENERATOR TREAT	MENT ☐ Containers ☐ Tanks ☐	☐ Containment Bldg. ☐ Drip Pad
2.	Universal Waste:	Large Quantity Handler	y Handler
	Universal Waste T	ypes	
3.	Hazardous Waste Tra	insporters:	0.4.48
		ST. JOSEPH MOTOR LINES	
	Transporter Name		License Number
Ļ.	Types of hazardous v	vaste generated and destination facility (loca	ation & type).
	Waste Code	Waste Description	Destination Facility
	Doo1 F003	WASTE PAINT RELATED	CHEM. CONSERV. OF GA.
	F005	MATERIAL	1612 J. P. ROGERS CIR.
			VALDOSTA GA. 31601
	0007 DOOB	HAZARDOUS WASTE SOLD	CHEM - MET SERV.
		LEAD/CHROME	18550 ALLEN ROAD
•		`	WYANDOTTE MI 48192
		·	
*			

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name GILES + RANSOME ID Number PAP 007910417

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS		5		PA CIT.	FED. CIT.	LINE	
	_	_		REQUIREMENT	25 PA Code	40 CFR	NO.
	Γ	3	4	Hazardous waste determination performed on all waste	262a.10	262.11	H001
X				streams Identification Number	262a.10	262.12	H002
X		Н		Authorized transporters only	262a.10	262.12(c)	H003
X	-			Subsequent notification requirements met	262a.12(b)		H004
×	-			Proper manifest used	262a.10	262.21	H005
×				Manifests filled out correctly and completely	262a.20		H006
		$\vdash$		Manifests signed and routed properly	262a.23(a)	262.23	H007
X	X	Н	_	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
×	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
		$\dashv$		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X	Н	+	$\dashv$	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X		-	-	Specified records retained for three years	262a.10	262.40(c)	H014
X	. /	-	-	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	×	$\dashv$	-	Exception reporting procedures followed	262a.42	262.42	H016
X		$\dashv$	-	Spill reporting procedures followed	262a.10	262.34(d)	H017
	$\dashv$	-+	-	PPC plan developed and implemented	262a.10	262.34(a)	H018
×		+		Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X	X	+	-	Source reduction strategy prepared and available (LQG only)	262a.100		H020
	4	$\dashv$	-	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021_
×	-	$\dashv$	$\dashv$	EXCIDENCE WHO COMPLETED THE CONTRACT OF THE CO			ļ
$\vdash$		+	-				
$\vdash \vdash$	-+	$\dashv$	-				
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# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name GILES + RAN SOME ID Number PAD 0079 10417 Date Z/14/2001

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS		5					
				DEOLUDEMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
<u> 1.</u>	2	3	4	REQUIREMENT	2017 0000	10 0.11	1
L				CONTAINERS (Subchapter I)	ļ		
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
×	·			Containers of hazardous waste in good condition	265a.1	265.171	H026
×	$\Box$			Containers and stored waste compatible	265a.1	265.172	H027
×				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
×				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X	П			Proper containment and collection systems in place \$00.05	265a.179		H033
×			$\exists$	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
		十	寸	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
×				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037
					(2)-		

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name GILES + RAN SOME ID Number PAD 0079 10417 Date Z/11/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

.

STATUS		IS		PA CIT.	FED CIT.	LINE
1 2	2 3	4	REQUIREMENT	25 PA CODE	40 CFR	NO.
			LQG TANKS (Subchapter J)			
	T		Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
H	†		Tanks labeled to accurately identify contents	265a.194		H044
			Required inspections completed and documented in operating log	265a.195	265.195	H045
			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	-		Special small quantity generator requirements	265a.1	265.201	H048
		-				
	T		Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
-11	1		If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
- +	†		Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
$\dashv$	-		All waste removed at closure	265a.1	265.201(d)	H056
			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
-#		$\vdash$	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	H	$\vdash$	Incompatible waste requirements met	265a.1	265.201(f)	H059
<b>-</b>			meompatible waste requirements			
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### HAZARDOUS:WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name GILES + RANSOME ID Number PADO079 10417 Date 2/14

1 - No Violation Observed

2 - Not Applicable 3 - Not Determined

4 - Non Compliance

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4	2	3 .	4 REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
Ė	<u> </u>		Containment Buildings (Subchapter T)	,		
			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	V		Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H0685
	$\perp$		-			ļ
	x		Drip Pads (Subchapter S)			-
			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
			Release reporting requirements met	265a.1	265.443(m)	H076
,	4		Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

### INSPECTION REPORT COMMENTS

Date of Inspection 2/14/2001 Identification Number PAD 0079 10417
Company/Facility/Site Name GILES + RANSOME, INC.
INSPECTION CONDUCTED BY ALEX PAGE. MIKE BARNASEVITCH
RISK MANACEMENT COORDINATOR, WAS THE FACILITY GUIDE
GILES + RANSOME IS A SALES AND REPAIR FACILITY
FOR "CATERPILLAR" HEAVY CONSTRUCTION EQUIPMENT:
G. + R. EMPLOYS ABOUT 300 PEOPLE WHO WORK
2 SHIFTS.
AT THE HAZARPOUS WASTE STORAGE AREA DRUMS
OF SOLID HAZARDOUS WASTE WERE LABELED WITH
ACCUMULATION START DATES. PORTABLE CONTAINMENT
PAILLETS ARE USED FOR LIQUID HAZ. WASTES
WHEN PRESENT.
AT A RECORD REVIEW TRAINING RECORDS WERE
AVAILABLE AND INCLUDED TOPIC DESCRIPTIONS, SIGN-IN
SHEETS AND COMPLETED TESTS. THE PPC PLAN
WAS AVAILABLE AND APPEARED COMPLETE WITH
ALL REQUIRED ELEMENTS. A MILD UPDATE WAS
NEEDED COORDINATORS NAMES + ADDRESSES AND
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Date
Inspector (signature)
Page <u>6</u> of <u>11</u>

### INSPECTION REPORT COMMENTS

Date of Inspection 2/14/2001 Identification Number PAD 0079 10417
Company/Facility/Site Name GILES + RANSOME, INC.
PHONE NUMBER AREA CODES NEEDED TO BE ADDED CHANGE
MANIFESTS WERE AVAILABLE AND APPEARED PROPERLY
COMPLETED AND ROUTED WITHIN TIME LIMITS. A
COPY OF SOLID WASTE STREAM MANIFEST AND A
COPY OF A LIQUID WASTE STREAM MANIFEST IS
INCLUDED WITH THIS REPORT.
NICKEL - CADMIUM BATTERIES WERE PRESENT AT THE
G.+ R. FACILITIES, SPENT NICKEL CADMIUM ALKALINE
BATTERIES ARE A UNIVERSAL WASTE AND ARE
EXEMPTED FROM REGULATIONS IF RECYCLED.
NO VIOLATIONS OBSERVED
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.
Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Date
Inspector (signature)
Page <u>7</u> of <u>1 (</u>



#### WASTE MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF **ENVIRONMENTAL QUALITY**

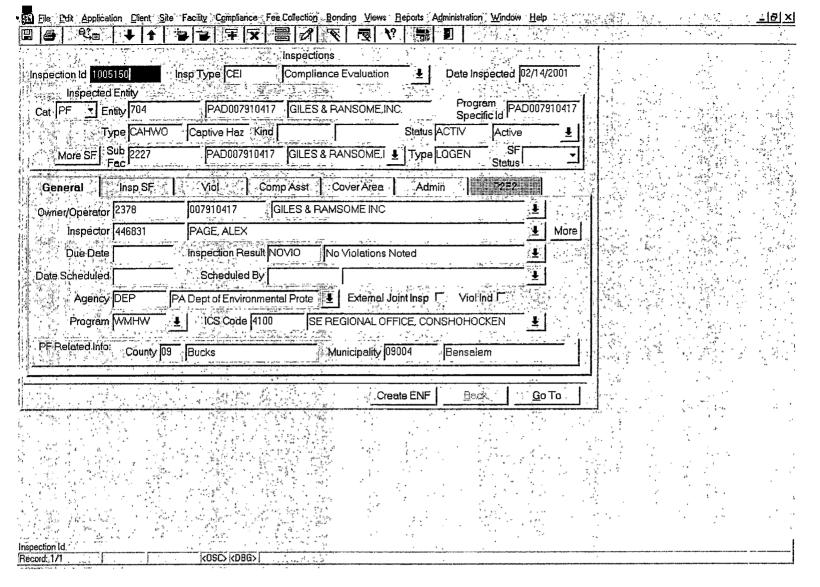
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Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Part 121 of Act 451, 1994, as amended.

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	NIFORM HAZARDOUS WASTE MANIFEST	1. Generator	9 7 9 1 8	4 1 7	ocument N	°.	f 1 is law.	9912	2152	Federal
3. Gene	erator's Name and Mailing Address				.5.	_ I _	tate Manifest			
GILES	& RANSONE INC.						/II /	<u>( UU</u>	<u>093 </u>	
2975	GALLOVAY ROAD, BENSALE	M. PA 1907	20			B. S	tate Generator	's ID		
4 Gene	erator's Phone ( (215) 639	-4300	1		•	.		•		
	sporter 1 Company Name		6. US EI	A ID Num	ber	,c. s	tate Transport	er's ID		
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1 1	-MET SERVICE, INC.					Ш Е	acility's Phone	<del> </del>		
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HM.	ID NUMB	ER).			No.	Туре		Wt/V		
a. X	BQ, HAZARDOUS WASTE,	SULID, M. O.	.S. (LEAD/							
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A.GII	41703	ed Above	STATE OF	ORIGII	i PA				K. Ha a b c	ndling Code
<b>A. GI</b> <b>B. GI</b>	41703	onal Information	NEEDS CD	SERT	TO MAEC				a b	ndling Code
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	20. F	Facility (	Owner or Opera	ator: Certifi	cation of re	eceipt of	hazardou	us mate	rials cove			except as n	oted in item 19.	,			MONTH	DAY YEAR
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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

# INSPECTION REPORT - HAZARDOUS WASTE SMALL QUANTITY GENERATOR

Site	e I.D	. <u></u>	F	AD 007910417	Telephone # (2,5)	639 - 6	1300
				ILES AND RANSOME, INC.			
				75 GALLOWAY ROAD	Address		
				USALEM , PA 19020			
Mu	nicip	palit	y <u>-</u>	BENSALEM TOWNSHIP	County BUCKS		
Res	pon:	sible	Off	icial MIKE BARNASEVITCH	Title RISK MANAGE	ement c	coor.
				ved MIKE BARNASEVITCH	Title RISK MANAG		
Insp	ecto	or _		LEX PAGE	Time 2:00 PM		
-	Due	Date	; _	Inspection Date Inspection Type  1/15/77  O I		tor ID #	Violation の
Are	haz	ardo	us v	vastes transported off-site by this generator?	Yes X No		
If no	ot, li	cens	e nu	mber(s) and expiration dates of transporter(s)	SAFETY KLEEN	AH	0172
				lo Violation Observed 2-Not-Applicable			•
1	STA	TUS	4	REQUIREMENT		CHAPTER CITATION	LINE NUMBERS
×				Amount of wastes generated per month is wi generator limits. Average waste generated n		261.5(a)	H491
××				Amount of waste accumulated is within smal	l quantity generator limits	261.5(d)	H492
×	<u> </u>	ļ		Hazardous waste determination (262.11)		261.5(g)(1)	H493
X				Records of quantities, descriptions and dispos for five years and furnished to the Departmen		262.11(d)	H494
×				Storage within time limit specified (261.5(d))	_	261.5(g)(2)	H495
X				Manifest system used for off-site transport		262.20(a)	Н496
<u>!</u> 61.!	5 In	dica		elow the method of handling of the waste:			
•	_		a.	Treatment or disposal at permitted on-site f			
					Trea		
	-		b.	Delivered to a PA haz, waste facility. Name	of facility:		
		<del></del>	c.	Delivered to a PA municipal or residual facil	ity with Form S approval. Nan	ne of facility.	
			d.	Delivered to an approved out-of-state facili	ty. Name of facility.		
	×	<u> </u>	е.	Delivered to a reclamation, reuse, or recycle  FAIRLESS HILLS, PA.			KLEEN

ER-WM-129: Rev. 12/93

Inspector (signature)

#### **COMMONWEALTH OF PENNSYLVANIA** DEPARTMENT OF ENVIRONMENTAL PROTECTION **BUREAU OF WASTE MANAGEMENT**

INSPECTION REPORT COMMENTS
Date of inspection $1/15/97$ Identification Number $PAD = 0.7910417$
Company/Facility/Site Name GILES AND RANSOME, INC.
INSPECTION CONDUCTED BY ALEX PAGE, MIKE
BARNASEVITCH, RISK MANAGEMENT COORDINATOR, WAS
THE FACILITY GUIDE. GILES AND RANSOME IS A SALE
AND REPAIR FACILITY FOR "CATERPILLAR" HEAVY
CONSTRUCTION EQUIPMENT. HAZARDOUS WASTES ARE
GENERATED FROM THE CLEANING AND DEGREASING OF
MOTORS AND OTHER PARTS. HAZARDOUS WASTES ARE
RECLAIMED THROUGH A CONTRACTUAL AGREEMENT WITH
SAFETY KLEEN WHO SUPPLY SIX DEGREASER
STANDS. A SMALL AMOUNT OF WASTE PAINT AND
WASTE PAINT RELATED MATERIAL IS ALSO
GENERATED.
THE SHOP AREA WAS INSPECTED AND OBSERVED
TO BE CLEAN. NO HAZARDOUS WASTE (OTHER THAN
DEGREASER STANDS) WAS PRESENT AT THE TIME OF
INSPECTION. MANIFESTS WERE AVAILABLE AND
APPEARED COMPLETE AND PROPERLY ROUTED, A COPY
OF A MANIFEST CHOSEN AT RANDOM IS INCLUDED
WITH THIS REPORT.
NO VIOLATIONS OBSERVED
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Para interviewed (signature)

ER-WM-129: Rev. 12/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection $1/15/97$	ldentific	cation Number <u>P</u>	AD 007	910417
Company/Facility/Site NameGILES	<b>\$</b>			
GILES AND RANS	OME, IN	JC. 15 F	HEREBY	CLEARED
OF A GENERAL RULES	AND	REGULAT	IONS V	IOI ATION
AS ISSUED ON 10	/19/89			, ock 1100
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This inspection report is notice of the findings of an notification of any violations observed during the inspection. Herein, or other violations identified as a result of review of labor. This report does not constitute an order or other appearably immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessary or that a copy was left with the person was shown the report or that a copy was left with the person interviewed.	ratory analyses or Decade action of the	on of violations may be in epartment records. Department. Nothing cor	issued concerning on tained herein shall to	either violations noted be deemed to grant or
Person interviewed (signature)	,		Date	
nspector (signature) (4)			Date	15/97
	3		Page 3	of 5

# PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Bureau of Land Recycling and Waste Management P.O. Box 8550

2500-FM-LRWM0051 REV. 11/95	- narrisp	urg, PA 17105-855	i0				Form approved, OMB No. 2050-0
UNIFORM HAZARDOUS	1. Generator's US EPA ID No		Manifest Document No.	2. Page 1	I Information	within the	Expires 9-30-96 blue border is no
WASTE MANIFEST 3. Generator's Name and Mailing Address	PAD 007910417	ſ	2333	of	required by	Federal law	w but may be
GILES & RANSOME		ઉ	64130	A. State	Manifest Document	Number	ARD
BENSALEM PA	19020			B. State (	PAC C	747	<del>1430</del>
4. Generator's Phone ( 215 ) 535 5. Transporter 1 Company Name	7-4300						
SAFETY-KLEEN COR		6. US EPA ID Number		C. State T			7 2
7. Transporter 2 Company Name		84909202 8. US EPA ID Number		PA	<u>-AH</u>		-
9. Designated Facility Name and Site Addres		,		D. Transp E. State T	orter's Phone ( 💆	5 //3	\$-369Q
		10. US EPA ID Number		PA	-AH		
SAFETY-KLEEN COR	<b>,</b> .				orter's Phone (	)	
FAIRLESS HILLS	PA 19030   PAD 98	7266715		G. State F		. 82. 94.	
11. US DOT Description (Including Proper SI	ipping Name, Hazard Class, and ID Number)		12. Contai	ners	's Phone ( 💆 🖰 )	14.	<del>景度等等</del> 1.
			No.	Туре	TotalQuantity	Unit Wt∕Vol	Waste No.
PETROLEUM NAPHT	USTIBLE LIQUID.N.O	.§. 001)	1 1 1	DM	1-		ដូចចរ
	0027, D039D040) (ERG	#128)		U.?	1/2	3	Q0 3 <b>9</b> 1
b.						++	
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c.			├──-		<u></u>	+-4	
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d.							
1 Additional Description							
J. Additional Descriptions for Materials Listed Lab Pack Physical State		Physical State	к	Handling C	odes for Wastes Lis	ted Above	
a	13 DUCE   c.	, , , ,		90₽	1		
.			a.		, c.		
b 15. Special Handling Instructions and Additiona	d.		<b>b</b> .				
so openial flamoling instructions and Additional	I Information	92865460		2-17	9-01-724	TP	
		I-A DO	00800271	)040°	1	77 GI	
EMERGENCY RESPHRO	RETURN TO GENERATO 0-468-1760 24HR	R.					
	A LOG TOON EATH						
	:	y 10083 B	)	Ċ,	Ð	,	
16. GENERATOR'S CERTIFICATION	I hereby declare that the contents of this	Consignment are fully					
16. GENERATOR'S CERTIFICATION classified, packed, marked and labeled and If I am a large quantity generator. I cerpracticable and that I have selected the pratte environment: OR, if I am a small quantito me and that I can afford.	are in all respects in proper condition for tran tify that I have a program in place to reduce	sport by highway accord the volume and toxicity	no accurately des ding to applicable v of waste genera	cribed above international	by proper shipping and national gove	name and roment regi	l are ulations.
the environment: OR, if I am a small quantition me and that I can afford.  Printed/Typed Name	y generator. I have made a good faith effort	posal currently available to minimize my waste g	to me which min eneration and sel	imizes the p ect the best	resent and future the waste management	mined to be areat to hun	e economically nan health and
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Printed/Typed Name		nature /	: 100		M	ONTH D	DAY YEAR
18. Transporter 2 Acknowledgement of Receipt of Materia	s	<u>ــر ل ر ـــ</u>	1 1 1:	JE-4	ĽĨ.		_
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19. Discrepancy Indication Space						]	
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20. Facility Owner or Operator: Certification of rec	eipt of hazardous materials covered by this m	anifect execut co	i= 14				
		ature	in item 19,	7	- MO	ONTH DA	Y YEAR
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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street Norristown, PA 19401 215-270-1948

November 15, 1989

Mr. Mike Barnesevitch Risk Management Coordinator Giles and Ransome, Inc. 2975 Galloway Road Bensalem, PA 19020

Re: Hazarous Waste Inspection
PAD 007910417
October 19, 1989
Bensalem Township, Bucks County

Dear Mr. Barnesevitch:

#### NOTICE OF VIOLATION

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75,267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(g)(1)(iii) - Containers managed in accordance with 75.265(q)(1)-(14). The four (4) drums of waste F001 (1,1,1 TCE) were in storage outside of the building with no containment system. The dates of accumulation on the drums were 9-4-89 and 9-5-89.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Mr. Mike Barnesevitch November 15, 1989 - 2 -

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at the above number..

Very truly yours,

Trederich P. Walter, Jr. FREDERICK P. WALTER, JR.

Waste Management Specialist

cc: Ms. Kurtz

Mr. Minihan

Division of Compliance & Monitoring

EPA

Re 30 WM318.7

ER-\WM-119: 9/88	Commonwealth of Pennsylva Department of Environmental Res Bureau of Waste Manageme	ources
ea <sup>™</sup>	nspection Report/Data	a Entry
Site I.D. # PAD 0 0 7 9 1 0  Site Name Los Y Ranson  Address 2 9 75 Sallow  Municipality Bonsalem  Responsible Official of the Legent Service		nsolem, fa. 19020
Date Inspection D	Inspection Faciliate Type Typ	
Sample # Low  Monitoring Points Sampled	Sample # High	
INSPECTION TYPE	Municipal ,	FACILITY TYPE  Residual Hazardous
01 Routine. 10 Survey 02 Spill Response 11 Part B 03 Remedial Action 12 Complaint 04 Follow Up 13 Withdrawn 05 Crit Stage 14 Closure 06 Sample Only 15 Post Closure 07 Permitting 16 Form 4 08 Superfund 17 Form 4 w/sa 09 Ground Water 50 Record Rev 99 Other	<ul> <li>O1 Municipal Waste Landfill</li> <li>O2 Construction/Demolition Landfill</li> <li>O3 Processing</li> <li>O4 Incinerator</li> <li>O5 Surface Application</li> </ul>	06 Landfill 07 Demolition 08 Processing 09 Incinerator 10 Surface Application 11 Surface Impoundment 12 Surface Injection Well 07 SQG 08 RRR 09 Other 50 Superfund

76-17-16

## Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### Hazardous Waste Inspection Report Generators — Part A

Date of inspection 10-19-89 Time start 1:00 Time finish
Name of inspector
Company, installation name Lills + Ransome, Inc.
Location 2975 Galloway Road Bensalem, la- 1902
County Buchs Municipality Bensalen Two
Identification number PAD 007910417
Name of responsible official John W. Cowart
Title Kish Wanagement Supervisor
Mailing address 2975 Galloway Rd. Bensalam to. 1902
Area code and telephone number $\frac{2157 - 6394300(\text{Sct.} 3251)}{}$
Name of person interviewed Milo Burnssonital
Title Risk Management Courdinator
Mailing address (if different from above)
Area code and telephone number $2/5-639-4300$ (Ext. $325/$ )
1. Current waste handling method:
a. 🗆 On-site 🗆 treatment, 🗆 storage, 🗆 disposal 🗆 PBR
b.  On-site use, reuse, recycle, reclaim
c. Off-site 🗆 treatment, 🗆 storage, 💢 disposal
d. Toff-site use, reuse, recycle, recycle,
2. Amount of hazardous waste produced:
a
b kg./yr.
3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).  Waste Number Destination Facility Location and Type
oct (TCE) Detrey Corp. 835 Industrial Have
Connaminson W.T. 0807
OCI (WASte) SAFETY Klosn Carp Bldy, PP#9 River Road
Tullytown, Par
003 Wasto Conversion Inc. 2869 Januatore David
Hat I ON to 1000
1, 14, 14, 14, 17

## Hazardous Waste Inspection Report Generators — Part B

	* 1—No	iolation Observed 2—Ho	t Applicacia	3—Hot Determined	4—Xon-Compliance
	Status		EQUIR	EMENIT	Charte Citation
1	2   3   4	Hazardous wasta determination			75.25
X	1 1	:		118	(b)
X		Identification number			(c:(1)
XI		Hazardous waste shipments off		<u> </u>	(c:(4)
XI		Authorization recaived from TSI		astas snioped off-sita	(d)
X		PA manifest used for intrastate		``	(ei(2)
KI		Oisooser state manifest or EPA	format manifes	t used for out-of-state shipments	(e)(3)
XI		Manifests filled out properly and	completely		(e)(7)
XI		Manifests routed properly and w	ithin time limit:	5 (7 days)	(e)(14) ar (15
X		Proper U.S. DOT shipping contain	iers or package	\$	(f)(1)(i)
V		Shipping containers marked and	abeled accordin	g to U.S. OOT	(f)(1)(iii
Χĺ		Containers of 110 gail or less m	arked with redu	ired PA labei	(f)(1)(iii)
	V	Placaros offered to transporter			(f)(2)
<u> </u>		Wastes accumulated on-site for le	es than 90 day	/S	(g)(1)(i)
		Wastes stored in proder container	s and property	markeo and labeled	(g)(1)(iii
	X	Containers managed in accordance	with 75.285ic	u(1)—:9)	(g)(1)( <del>iii)</del>
		Containers clearly marked with ac	cumulation date	and visible for inspection	(g)(1)(ivi
1		Records retained at designated loc	ation for 20 //e	zars	(h)
IX	1 1 1	luarteny reports submitted to the	Department	<del></del>	(i)
1		aception reporting procedures follo	lwed		(i)
		azardous waste disposal pian. if r	equired	<del></del>	(1)
j		oil reporting procedures followed			(m)(1)
		reparedness, Prevention and Contin	igency Plan ani	1 implemented	(m)(5)
X	S	secial requirements followed for in	ternational ship	ments	(a)
		the job or classroom personnel t	raining program	(75.285(f))	(g)(1)(6)
<u> </u>	0	um accumulation area inspected w	veekiy as der 7	5.256(q)(5)	(g)(1)(iiii
				······································	
		<del></del>	<del></del>		
Ī		<del></del>		<del>-</del>	

#### PRINCE VIVIEW OF WASTE MARROSMENT

## Hazardous Waste Inspection Report Comments — Part C

Date of Inspection 10-9-99	Identification Number 17007910417  Ensome Que  Municipality Bensalem Tup*
Company Installation Name	ensome Que
County Buchs	Municipality Plusalem Tup "
200mly	
this company has	detrex Corp Cennaminson
N.J. and Safety Kleen	Corp. as transporters
of their hogarious wo	este.
0	
tool If Tet is	s pulled up about every
4 mos.	
•	
Kerjetone Block T	ransportation Co. Lines
waste caustic sluly	to ( Horny duty-per tocleaner)
to Wasto Conversion	ransportation Co. Lawlet (Korveyduty-particleance) Hatfield /a. 19440.
Bob mc Clay (215) 9.	43-2605 Kauls tho
Sunh batterses to	43-2605 Kaule tho Canada - ESA23406218
Those are present	tly 4 (55 2) drums of
Fool (1,1) TCES wast	they 4 (55 L) drums of outside of the binking. ent system mer roof
There is no contrium	ent system nor roof
one the dreems to pro	went rain HO, precipitation
from displacing the le	quel west inside the
dringe Natos of accus	no - 9-9-89, 9-5-89.
This subject of Ca	ortainment should be
addressed - per 75.265	Q()-(4).
This inspection report is official notification that	a representative of the Department of Environmental
Resources, Bureau of Waste Management, insignsection are shown in this report. Any viola	spected the above installation. The findings of this tions which were uncovered during the inspection
are indicated. Violations may also be discove	ered upon examination of the results of laboratory otification will be forthcoming, confirming any viola-
tions indicated herein and listing any addition	al violations.
	+1 11-19-D9
Person Interviewed (signature) Muchael D. Barnasev	Date Date
Inspector (signature)	Date / 0 / 9 - 3 /

<b>GEPA</b>		ON OF HAZARDOUS		YTIVITS		46: If you receiv	
INSTALLA- TION'S EPA I.D. HO.	T	RECEIVED			information on through it and	in the space at is the label is inco- supply the con- late section below	rect, draw a line rect information
I. STALLATION					complete and	correct, leave Ite	ms 1, 11, and 111
INSTALLA- TION II. MAILING ADDRESS	PLEAS	JUL 1 1 1986 SE PLACE LABEL IN	THIS SPAC	E	label, complete single site who treated, stored	all items. "Insta are hazardous wa and/or disposed pel place of busin	listion" meens a ste is generated, of, or a trans-
LOCATION III OF INSTAL- LATION		EPA, R3			to the INSTRI CATION before information re	OCTIONS FOR F ore completing quested herein is of the Resource	TLING NOTIFI- this form. The required by law
FOR OFFICIAL U	SE ONLY						
<u></u>		COMME	NTS	$\overline{1}$	<del>                                      </del>	<del></del>	$\mathbf{H}$
C			TE RECEIVED				33
#DANDO	79110U1		6 17 16				
I. NAME OF INST	**************	11 12 12					
61455	+ RANS	ome INd					
II. INSTALLATIO	N MAILING ADI	DRESS					
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501111	CITY	OR TOWN		ST. ZI	PCODE		
4 BE NS A	lie m Mai		45	PALI	1020	200	
III. LOCATION C		N TOR ROUTE NUMBER					
5 SAMe	AS ABO	Jelli		HIII	$\Box$ $\alpha$	7	
18 18	CITY	OR TOWN		ST. 21	PCODE	h l	
6 SAME A	TS ABO	ve III				bu <i>lly</i>	
IV. INSTALLATI	ON CONTACT			EXPOREM PREMI	- 81		
릭이 그는	NAME AN	D TITLE (last, first, & job tit)			PHONE	NO. (area code &	10.)
2 P 112 C 11	CIAI IVIELEI	PLANTE	NGINE	IER	41 45 41	639 93	000
V. OWNERSHIP		A. HAME OF INSTALLAT	ION'S LEGAL C	WNER			
\$ G 1165	4 RAN	SOME			THIII		
(enter the appropria	WNEWSHIP	VI. TYPE OF HAZARDO	US WASTE A	CTIVITY (	enter "X" in th	e appropriate b	ox(es))
F = FEDERAL		A. GENERATIO	N	Dag to	TRANSPORTA	rion (complete li	tem VII)
M = NON-FEE	S #	G. TREAT/STOR		e to	UNDERGROUN	ID INJECTION	
-		N (transporters only - ent					ar in the residence
41	B. RAIL	G. HIGHWAY	D. WATER	E. OTHE	R (specify):		
VIII. FIRST OR S Mark "X" in the app	ropriate box to indic	ate whether this is your install	lation's first noti	fication of he	zardous waste ac	tivity or a subsequ	uent notification.
IT this is not your fin	st notification, enter	your Installation's EPA I.D. N	lumber in the sp	ace provided		INSTALLATION	S FPA LD NO
MA. PIRET	ROTIFICATION	A. BURSEQUENT N	OTIFICATION	faomplete ite			
IX. DESCRIPTIO		_					
	<del></del>	US WASTES	tion.			The state of the s	Control of the Party of the Par

				W		
DESCRIPTION OF I			(ront) four-digit number from	AS OFFICE AND ADDRESS.		
watte from non-specific	sources your installation	on handles. Use addition	al sheets if necessary.	140 CFH Part 261,31	for each listed hazardor	US
	2	1	4		6	
Flolola	F003					
7	B 15	25 - 24 S	10	11	39 - 25 12	
FOOL	FONE				Hill	
Hinini.	HIOIOI2	123 ± 126	25 - 24	13 - 15	B . B	
pecific industrial sources	your installation hand	INCES. Enter the four-inces. Use additional sheet	digit number from 40 CF if necessary.	R Part 261.32 for eac	h listed hazardous west	e fro
13	14	38	16	17	18	
19	20 20	21	22	23 - 34	24	
43 - 44	23 - 34	33 + 34	23 - 28	53 - 25	#H = H4	
25	24	27	2.5	28	16	
33 - 34	A2 : 38	23 - 24	23 - 29	15 . 20		
OMMERCIAL CHEMIC	AL PRODUCT HAZAF	POOUS WASTES. Enter	the four-digit number i	rom 40 CFR Part 26	.33 for each chemical s	ub.
31	32	52	34	35	1 1	
<u> </u>	PAZ				36	
\$2 - 38	## - ## ## - ##	23 29	22 - 28	25 - 26	23 - 34	
37	38	39	40	41	62	
0 159	22 - 54	23 - 24	22 - 34			
42	44	49	46	47	48	
U228						
ISTED INFECTIOUS W	ASTES. Enter the four	redinit number from 40	CFR Part 261.34 for eac	h linear have artered	28 - 36	
pepitals, medical and res	earch laboratories your	Installation handles, Us	e additional sheets if nec	rstary.	are trum mospitms, veter	rinai
42	\$B	<u> </u>	82	53	84	
HARACTERISTICS OF	NON-LISTED HAZA	RDOUS WASTES, Mark	("X" in the boxes corres	ponding to the charac	teristics of non-listed	
remotions sensing April 118	enne men rendies. Idea	90 CFR PBrts 201.21 -	261.24.)			
MI. IGHITAE		Z. CORNOSIVE	[]3. REAC	FIVE	(D000)	
ERTIFICATION						
elieve that the submi	u cour vasea on my tted information is	inquiry of those ind	and am familiar with ividuals immediately omplete. I am aware orisonment.	reprinancials for an	taining object to farme - a	
ATURE			ICIAL TITLE (type or p	rint)	DATE SIGNED	
LANDON J. A	Ma.	Donald	L. Sprague Vic	111	7/10/86	

RECEIVED PA STOTION

I.D. - FOR OFFICIAL USE ONLY

JUL 1 1 1986

ER-WM-117: Rev. 4/87

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

(GEN (lg))

### **INSPECTION REPORT**

01					
Site ID #	0079/04/7	License #			49 1 64
Site Name:	les & Kansom	e Inc. Phone #	12151639	-4300	(Est 251)
Address 297	5 Salloway	Rd.	1		1/1020
City Somo	alem 0	State	Pa.	Zip C	ode 19020
Municipality	Jensalem Ting	County _	Buch		
5 "1 0" 11	Defa 11).	evant Title M	il Ma	4	Danisa
Responsible Official		, I till greet	an rip	er sup	,
Person Interviewed	The state of the s	Title			
Inspector	Took 11)0 6	to			
V					
Inspection Type		Generator Only)			
01 Routine		1 Routine	Hazardous 🏻	Treat	ment 🗆
04 Follow Up		4 Follow Up	Residual	Stora	
05 Crit Stage		6 Sample	Municipal		sal 🗆
06 Sample Only		0 Survey	Widilicipal L		rator 🖾
07 Permitting		2 Complaint			essing
08 Superfund		O Record Rev			ce App □
09 Ground Water		8 Other			porter 🗆
10 Survey	50 Record Rev			PBR	
	99 Other				
		•	On Site	Start Time	2:00
25				End Time	2:40
Site ID #	017191/014117			Total Time _	40 min.
One is " /	<del></del>		00.13	AT A STEEL PROPERTY.	
Due Date In:	spection Date Typ	pe Inspector	ID # #	Violation	Enforcement
	11/1/189 151	1 121/15	4	10101	111
		1 delle	Į <b>Z</b> I	OL O	
Comment L					
		1 1 1 1			
Sample # Low	Sample	# High			
Monitoring Points Sa	moled				
I Work of the Co					
				11111	11111

## Pennsylvania Department of Environmental Resources Bureau of Wasta Management

### Hazardous Waste Inspection Report Generators — Part A

Date of inspection Time start Time finish
Name of inspector Tred Walter
Company, installation name Like & Ransonl
Location 2975 Galloway Road
County Buchs Municipality Densalem Trup.
Identification number 111007910417
Name of responsible official John W. Corpart
Title Kiele Management Supervision
Mailing address 2975 Stalloway Brad Densalom
Area code and telephone number 255-639-4390
Name of person interviewed John W. Cowart
Title
Mailing address (if different from above)
Area code and telephone number $2/5-639-4300$
1. Current waste handling method:
d. ☑ Off-site □ use, □ reuse, □ recycle, ` □ reclaim
2. Amount of hazardous waste produced:
a. 948 / mo. Foo kg./mo. 200/ - 200/ mo.
2. Amount of hazardous waste produced:  a. $942! / mo$ . $Foo$ kg./mo. $Dool = 220P/mo$ .  b. $kg./yr$ . $Dool = 1841/mo$ .
·
3. Types of hazardous waste produced by Hazardous Waste Number:
5. Types of mazarasia trade products of mazarasia trade to the second of
4. Are hazardous wastes transported off-site by the generator?   Yes   No

#### Penasylvania Department of Environmental Resources Bureau of Waxta Management

## Hazardous Waste Inspection Report Generators — Part B

	_		· -	lation Observed 2—Not Applicable 3—Not Determined 4—	-Non-Compliance
Status			REQUIREMENT	Chapter Citation	
1 .2	. 2	_ 3	4		75.262
				Hazardous waste determination, copies available	(b)
				Identification number	(c)(1)
				Hazardous waste shipments offered only to licensed transporters	(c)(4)
				Authorization received from TSD facility for wastes shipped off-site	(d)
				PA manifest used for intrastate shipments	(e)(2)
1				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
				Manifests filled out properly and completely	(e)(7)
				Manifests routed properly and within time limits (7 days)	(e)(14) or (1
				Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		X		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
		ì		Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
1				Placards offered to transporter	(f)(2)
				Wastes accumulated on-site for less than 90 days	(g)(1)(i)
				Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
				Containers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(iii)
1				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
1				Records retained at designated location for 20 years	(h)
				Quarterly reports submitted to the Department	(i)
				Exception reporting procedures followed	(j)
				Hazardous waste disposal plan, if required	(1)
				Spill reporting procedures followed	(m)(1)
4				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	X		,	Special requirements followed for international shipments	(0)
1				On the job or classroom personnel training program (75.265(f))	(g)(1)(6)
1				Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)
1			_		
1	_				•
$\perp$					

#### Pannsylvania Department of Environmental Resources Bureau of Waste Management

## Hazardous Waste Inspection Report Comments — Part C

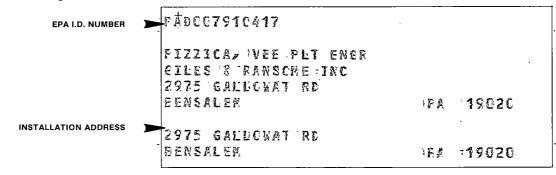
Date of Inspertion /-//-33	Identification Number 90079/04/7
Company Installation Marco	anl
County Bucha	Municipality Rensallin Trup-
_	·
Detrey Corp.	835 Sid. Hwy.
Junaminson, No	1 08073 in Apris
	tad fool waste hander
to a designated faci	lify at the same
adares Latet	
Fool waste in pie	hel is every of mose waste is to to
(approx.). Fool	vasto is to L.
••	
Jakely Cloon	Corp- is the contracted
Dool (waste getra	leum mapthy) ward
haules to their dos	ignated facility
Tullylown 19. 19	007. The seposales
peckup of Dool a	ast is appropriately
Ivery 2 mosso	
Keystono Block Tran	
waste to Waste Conversion &	X
is RQ Wasto Corrosine Jolid (	
was 12-17-87. Presently stor	ed in 55 fal. drums (4 on-site)
- This company is one	Vianely of 12
BI MCOD COLO	
- Bob McClay - 943-2	
lugs to Canada - 20,	9 23406218
This inspection report is official notification that a Resources. Bureau of Waste Management, insp	representative of the Department of Environmental ected the above installation. The findings of this
inspection are shown in this report. Any violation	ons which were uncovered during the inspection
analyses and review of Department records. Not	ed upon examination of the results of laboratory ification will be forthcoming, confirming any viola-
tions indicated herein and listing any additional	violations.
Person Interviewed (signature) John St. Coulor	Date
	Udle



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA Form 8700-12B (4-80)